

Aug 12, 2022ANGELA E. NOBLE
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United States District Courtfor the
Western District of New York

United States of America)

v.)

Case No. 22-MJ-616

[REDACTED])
ALLEN CLARK, and LIZA J. FREIMAN)**OUR CASE NO: 22-6390-MJ-STRAUSS***Defendants***CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

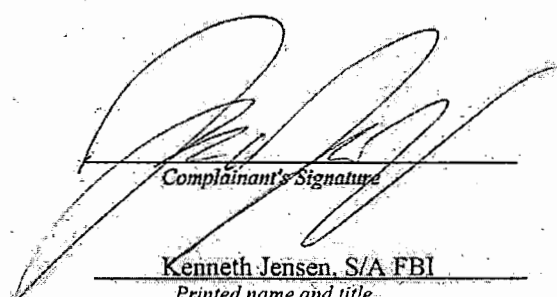
Between on or about December 2021 and March 2022, in the counties of Chemung, Schuyler and Monroe in the Western District of New York and elsewhere, the defendant violated 18 U.S.C. §§ 1344, 1349 & 1028A, offenses described as follows:

the defendants each conspired to commit, aided and abetted the commission of, and substantively committed and attempted to commit bank fraud and aggravated identity theft, all in violation of Title 18, United States Code, Sections 1344, 1349 & 1028A.

This criminal complaint is based on these facts:

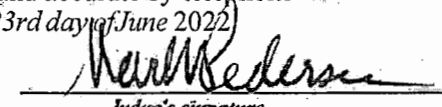
X Continued on the attached sheet.

Please see attached affidavit


*Complainant's Signature*Kenneth Jensen, S/A FBI
Printed name and title

Affidavit submitted by email/pdf and attested to me as true and accurate by telephone consistent with Fed.R.Crim. P. 4.1 and 4(d) before me this 23rd day of June 2022

Date: 23 June 2022


Judge's signature

City and State: Rochester, New York

Hon. Mark W. Pedersen, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF MONROE) ss:
CITY OF ROCHESTER)

I, Kenneth A. Jensen Jr., having been duly sworn, depose and state:

1. I am a Special Agent of the Federal Bureau of Investigations (FBI). As a Special Agent of the FBI, I am an investigative or law enforcement officer of the United States, empowered to perform investigations and arrests related to violations of federal law, including crimes involving fraud and identity theft. I have been employed as a Special Agent with the FBI since March of 2002, and am currently assigned to the Corning, New York, Resident Agency.

2. This affidavit is submitted in support of an application for a criminal complaint charging [REDACTED] ALLEN R. CLARK, LIZA J. FREIMAN and [REDACTED] with violations of Title 18, United States Code, Sections 1344 (bank fraud), 1349 (conspiracy to commit bank fraud), and 1028A (aggravated identity theft) (the SUBJECT OFFENSES).

3. The information contained in this affidavit is based on my investigation, personal knowledge, training and experience, and information provided to me by members of the law enforcement community. Because this affidavit is being submitted for the limited purpose of establishing probable cause to secure a criminal complaint, I have not included every fact known to me concerning the investigation. Instead, I have set forth the facts which I believe are necessary to establish probable cause to believe that [REDACTED] [REDACTED] ALLEN R. CLARK, LIZA J. FREIMAN and [REDACTED] did commit the SUBJECT OFFENSES.

GENERAL DESCRIPTION OF THE CONSPIRACY

4. The activities of conspiracy described herein are briefly summarized as follows:

a. A group of individuals are chosen by a crew leader to use rental vehicles to travel a significant distance from Fort Lauderdale, Florida, the area where conspiracy appears to have originated and continues to be loosely administered. Upon arrival at a target location, the group seeks to identify an individual (most often female) to recruit into the conspiracy to impersonate a victim of the conspiracy (and serve as a decoy for law enforcement).

b. The group performs "smash and grab" robberies from unattended vehicles located in public parking areas seeking to steal personal identification and banking information. After obtaining stolen identification and banking information, the group then travels from the area where the smash-and-grab victims would likely do their banking.

c. The group then uses the stolen identities and banking information to cash checks drawn on the account of a victim while using the identity of another victim to do so. The decoy poses as a victim and performs a fraudulent check cashing transaction from the drive-through lane of a bank. This lane is used because of diminished camera coverage and hampered ability of bank employees to make a visual identification of the person performing the transaction.

d. Often, other members of the group follow the decoy in another vehicle that serves in the role of a look-out and, if necessary, a getaway vehicle.

PREVIOUS CONVICTIONS

5. According to publicly-available records, on March 23, 2018, [REDACTED] was convicted of violations of 18 U.S.C. §§ 1344, 1349 and 1028A, via plea agreement, in the Eastern District of Michigan (Case 2:18-cr-20079-GAD-EAS).

6. The factual basis in the plea agreement describes a conspiracy similar to the one alleged herein. Specifically, [REDACTED] and his cohorts stole identification and banking information by breaking into vehicles and homes. They then used the stolen account and identity information to impersonate a victim and cash fraudulent checks in the victim's name. [REDACTED] and his associates used rental vehicles and recruited female accomplices to perform the impersonation. The scheme also included co-conspirators riding in the vehicle perpetrating the larceny to provide direction to the decoy. Additionally, the plea agreement noted that [REDACTED] and co-conspirators used the far drive-through lane to avoid the teller being able to identify the customer, and a second vehicle to act as a look-out vehicle.

7. On January 26, 2018, ALLEN R. CLARK was convicted of violations of 18 U.S.C. §§ 371, and 1029(a)(3), via plea agreement, in the Middle District of Louisiana (Case 3:18-cr-00009-SDD-EWD).

8. The factual basis in the plea agreement describes a conspiracy similar to the one alleged herein. Specifically, CLARK and his cohorts stole identification and banking information by breaking into vehicles. They then used the stolen account and identity information to impersonate a victim and cash fraudulent checks in the victim's name. CLARK and his associates performed some impersonations and recruited accomplices to perform other impersonations. CLARK and his associates would alter their appearance with wigs and sunglasses to appear to be the victims of the identity theft.

ONSET OF THE CURRENT INVESTIGATION

9. This investigation began on January 13, 2022, when a female, later identified as LIZA FREIMAN, attempted to cash a fraudulent check in the amount of \$3485.00, drawn on the account of Victim 1, using a driver's license and debit card in the name of Victim 2, at the Elmira Savings Bank branch in Southport, New York, within the Western District of New York.

10. At the time, FREIMAN was driving a 2021 white Hyundai Sonata bearing stolen New York State license plate GYV9229, which had been placed over the proper Florida license plate KCT104. The teller who provided service to FREIMAN, recognized FREIMAN from a briefing she had received earlier regarding a female who had previously perpetrated fraudulent transactions at other Elmira Savings Bank branches. The teller notified law enforcement and attempted to stall FREIMAN while awaiting the arrival of law enforcement.

11. As deputies from the Chemung County Sheriff's Office arrived, the vehicle driven by FREIMAN departed the bank location and fled law enforcement. After a short chase, the vehicle pulled to a stop and FREIMAN was arrested.

12. I have viewed the police dash camera which recorded the stop and arrest. As the vehicle came to a stop, a black male can be seen exiting the passenger side of the vehicle

and fleeing on foot.¹ The black male, whom I believe to be [REDACTED], was wearing a jacket identical to the one that [REDACTED] was wearing during a traffic stop discussed in paragraphs 22 – 23, below.²

13. In addition, the white Hyundai Sonata was rented by [REDACTED] (a black male), from Enterprise Car Rental in Lauderhill, Florida on December 08, 2022. The



rental agreement contains telephone number (786) 328-██████ for ████████, which the United States Probation Officer assigned to supervise ████████ confirmed is the telephone number he used. Also associated with the car rental are ████████ date of birth and Florida driver's license number. The vehicle was seized by law enforcement and later searched.

FURTHER INFORMATION DEVELOPED DURING THE INVESTIGATION

14. After FREIMAN'S arrest on December 13, 2022, investigation revealed the information set forth below.

15. On December 31, 2021, Victim 3 was hiking with her family at Skaneateles conservation area, in Skaneateles, New York. During the hike, Victim 3's vehicle was parked in the lot associated with the conservation area. Upon her return, she discovered that the vehicle had a rear window broken and purse stolen from the vehicle. The purse contained identification and banking information. After making a report to law enforcement, Victim 3 also noticed that her Apple AirPods were missing. The AirPods could be tracked by GPS using Victim 3's Apple account.³

16. Also on December 31, 2021, Victim 2 reported that she was parked at The Sinclair, an event center located in Skaneateles, New York, performing her duties as a wedding photographer. Upon returning to her vehicle, Victim 2 discovered a rear window smashed and her purse stolen. The purse contained Victim 2's identification and banking information.

17. On January 1, 2022, Victim 4 was hiking at Mendon Ponds Park, Honeoye Falls, NY. Her vehicle was parked in the lot associated with the park. Upon returning from

³ Victim 3 made efforts to track the location of her stolen AirPods and provided that information to law enforcement to aid in the investigation. Some of that information is mentioned below.

the hike, Victim 4 noticed that her vehicle had been broken into and her purse stolen. Her purse contained banking and identity information.

18. On January 5, 2022, Victim 1 was present at the Gold's Gym located on Publisher's Parkway in Webster, New York. Victim 1 returned to her vehicle at approximately 6:30 PM and found the driver's side window of her vehicle smashed. Victim 1's purse had been stolen from the passenger side of the vehicle. The purse contained her identification and banking information.

19. Of particular note, the AirPods stolen from Victim 3 travelled from the vicinity of Ithaca, New York, to the Philadelphia, Pennsylvania area on January 2, 2022, and remained in the Philadelphia, Pennsylvania area on January 3, 2022. On January 4, 2022 -- the day before the theft of Victim 1's information -- AirPods traveled to the Rochester, New York area, and remained there on January 5th, 2022 (the date the theft from Victim 1 occurred). In fact, approximately 30 minutes before the theft, and 1 hour and 15 minutes after the theft, the AirPods were located within 7 miles of the theft location.

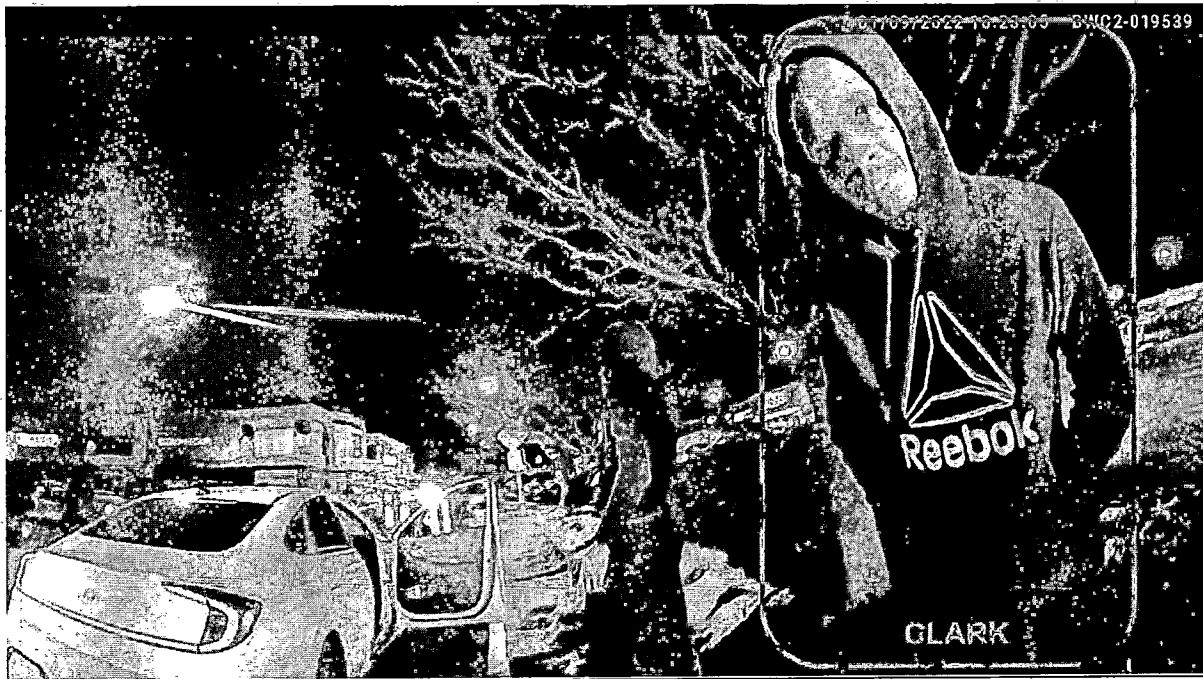
20. On January 06, 2022, Victim 5's banking checkbook was stolen from his girlfriend's vehicle as a part of a break in. The vehicle was parked at the Ithaca Children's Garden, Ithaca, New York, at the time of the theft.

21. During the search of the white Hyundai Sonata that FREIMAN was driving as she was arrested, a receipt from a money remitting service was discovered. The receipt showed the sender of funds to be [REDACTED] of Fort Lauderdale, Florida. The funds were sent by [REDACTED] from the Ithaca, New York, Walmart, on January 6, 2022, at approximately 11:02 AM. Victim 5 estimated that the theft from his girlfriend's vehicle occurred at approximately 9:30 to 10:00 AM, also in Ithaca, New York.

I have reviewed surveillance camera footage from the Walmart store in Ithaca, New York. From views covering the parking lot, a white sedan can be seen arriving at the Walmart just before 11:00 AM. Two individuals emerged from the vehicle and entered the Walmart. Cameras within the store then show the two individuals entering the store, approaching the service desk, and performing a transaction. Based on their appearance, I believe the individuals to be [REDACTED] and ALLEN R. CLARK.

22. On January 9, ALLEN R. CLARK was arrested in Boston, MA, after a traffic stop in which he was driving the white Hyundai.⁴ I have reviewed that body camera footage associated with the incident and believe that [REDACTED] was the

4



passenger in the vehicle during the traffic stop.⁵ [REDACTED] can be seen wearing a Boston Bruins sweatshirt during the incident, which appears identical to the sweatshirt located in the white Hyundai after the arrest of FREIMAN on January 13, 2022.⁶

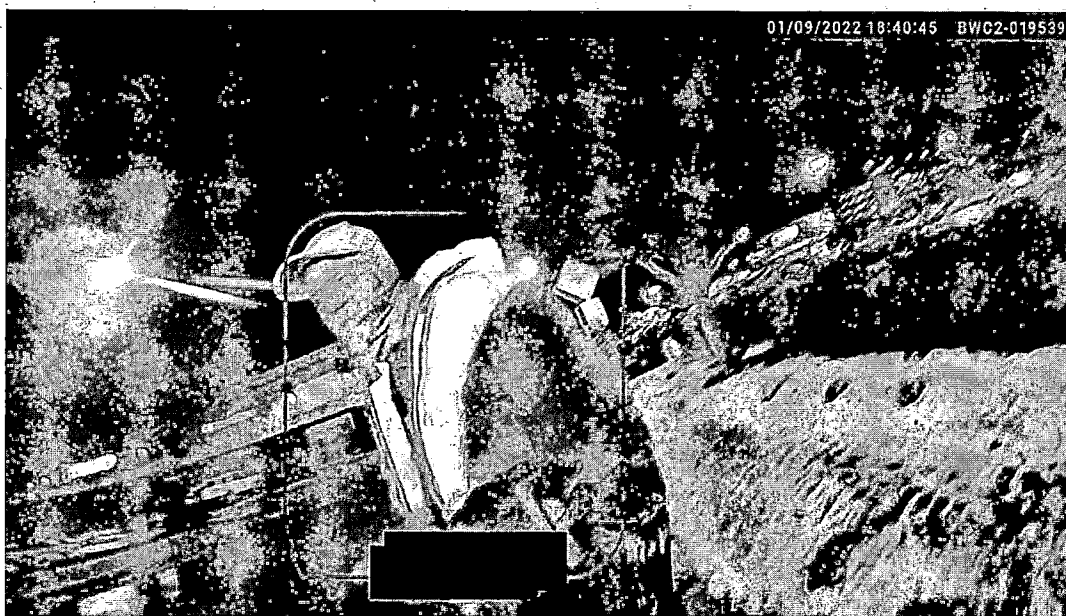
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6

23. As the investigation related to the traffic stop progressed, the officers needed to identify a licensed driver to whom they could release the white Hyundai. [REDACTED] appeared on the scene and presented his driver's license. The police officer ran [REDACTED] license in a national law enforcement database during the course of his investigation. Based on my review of the body camera footage, [REDACTED] appeared to have been wearing an outer jacket⁷ identical to the jacket worn by the individual who fled the scene of the arrest of LIZA J. FREIMAN.⁸

24. On January 10, 2022, Victim 6 was the victim of a smash and grab larceny. At approximately 6:00 PM, Victim 6 was returning to her vehicle which was parked at the Planet fitness located at 2318 West Genesee Street, Syracuse, New York, when she



⁸ In keeping with the conspiracy's methodology, I believe that LIZA J. FREIMAN was recruited to play the role of "decoy" for the crimes described herein while [REDACTED] CLARK and [REDACTED] were in Massachusetts. LIZA J. FREIMAN was from Massachusetts, having a last known address of 16 Reid Terrace, Swampscott, MA. She is first associated with the conspiracy only after their trip to Massachusetts.

discovered the driver's window smashed. A purse containing Victim 6's identity and banking information was missing.

25. Having obtained by theft multiple sets of identities and banking information, as well as having recruited a "decoy" in the person of FREIMAN, the group began to commit acts of bank fraud by cashing fraudulent checks using stolen identities.

26. On January 11, 2022, eight bank frauds were perpetrated using a white sedan with a driver appearing to be LIZA J. FREIMAN. The larcenies happened at branches of ESL Federal Credit Union and Elmira Savings Bank.⁹ The larcenies, summarized below, were all performed using identity and banking information associated with the victims of the smash and grab robberies described above.

27. On January 11, 2022, at approximately 10:33 AM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 2480 Ridgeway Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 1, cashed a check in the amount of \$2750.00 and drawn on the account of Victim, 6 made payable to Victim 1.

28. About 30 minutes later, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 215 Merchants Road, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 1, cashed a check in the amount of \$2785.00 and drawn on the account of Victim 6, made payable to Victim 1.

⁹ Both ESL Federal Credit Union and Elmira Savings Bank are federally insured financial institutions.

29. After another half hour, at approximately 11:37 AM a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 2256 Hudson Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 1, cashed a check in the amount of \$2850.00 and drawn on the account of Victim 6, made payable to Victim 1.

30. At approximately 12:02 PM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 3508 Mount Read Blvd., Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 1, cashed a check in the amount of \$2785.00 and drawn on the account of Victim 5, made payable to Victim 1.

31. Later, the conspirators then perpetrated larcenies at various locations of Elmira Savings Bank.

32. At approximately 2:23 PM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the Elmira Savings Bank branch located at 712 North Franklin Street, Watkins Glen, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 2, cashed a check in the amount of \$2445.00 and drawn on the account of Victim 6, made payable to Victim 2.

33. At approximately 3:00 PM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the Elmira Savings Bank branch located at 971 County Route 64, Elmira, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 2, cashed a check in the amount of \$2480.00 and drawn on the account of Victim 1, made payable to Victim 2.

34. At approximately 3:30 PM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the Elmira Savings Bank branch located at 1136 Pennsylvania Avenue, Elmira, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 2, cashed a check in the amount of \$2450.00 and drawn on the account of Victim 1, made payable to Victim 2.

35. At approximately 3:45 PM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the Elmira Savings Bank branch located at 930 West Church Street, Elmira, New York. An individual cashed a check in the amount of \$2500.00 and drawn on the account of Victim 6, made payable to Victim 2.

36. On January 12, 2022, the bank larcenies attributable to the conspirators continued.

37. At approximately 10:46 AM, a grey Subaru SUV with no front mounted license plate¹⁰ arrived at the drive through lanes of the ESL Federal Credit Union branch located at 2480 Ridgeway Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2895.00 and drawn on the account of Victim 6, made payable to Victim 4.

38. At approximately 11:11 AM, a grey Subaru SUV with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 2256 Hudson Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2840.00 and drawn on the account of Victim 6, made payable to Victim 4.

¹⁰ I believe that the same grey Subaru was used as the "look out" vehicle during the January 13 attempted bank larceny that resulted in FREIMAN's arrest.

39. At approximately 11:35 AM, a grey Subaru SUV with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 215 Merchants Road, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2875.00 and drawn on the account of Victim 6, made payable to Victim 4.

40. At approximately 12:02 PM, a grey Subaru SUV with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 3508 Mount Read Blvd., Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2785.00 and drawn on the account of Victim 6, made payable to Victim 4.

41. At approximately 12:40 PM, a grey Subaru SUV with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 1881 Monroe Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 1, cashed a check in the amount of \$2875.00 and drawn on the account of Victim 6, which was made payable to Victim 1.

42. At approximately 1:11 PM, a grey Subaru SUV with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 3169 Chili Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 1, cashed a check in the amount of \$2760.00 and drawn on the account of Victim 6, made payable to Victim 1.

43. At approximately 1:44 PM, a grey Subaru SUV with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 745 Long Pond Road, Rochester, New York. An individual appearing to be LIZA J.

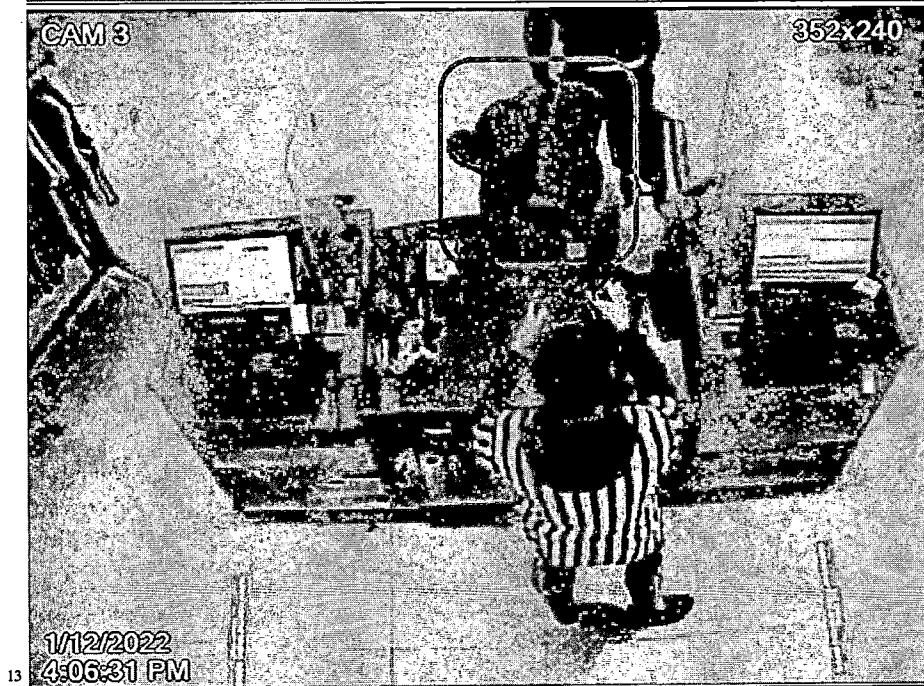
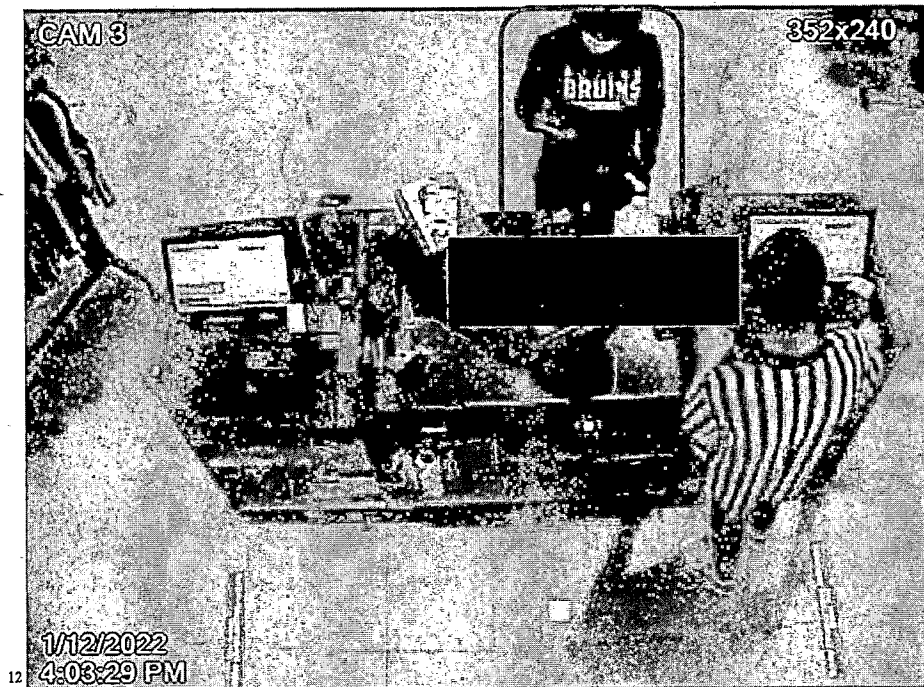
FREIMAN, posing as Victim 1, cashed a check in the amount of \$2890.00 and drawn on the account of Victim 6, made payable to Victim 1.

44. At approximately 2:20 PM, a larceny occurred via the drive through lanes of the ESL Federal Credit Union branch located at 100 Canal View Blvd., Rochester, New York. An individual, posing as Victim 1, cashed a check in the amount of \$2890.00 and drawn on the account of Victim 6, made payable to Victim 1.¹¹

45. Just over an hour after the last larceny on January 12, 2022, the grey Subaru SUV was captured on an automated license plate reader located at an entrance to Eastview Mall, in Victor, New York. The search of the white Hyundai sedan yielded a receipt from the footlocker store in Eastview Mall, dated January 12, 2022 at 4:00PM. The customer's name on the receipt is [REDACTED]. I have reviewed the in-store surveillance camera footage associated with the particular transaction. The footage reveals an individual I believe to be [REDACTED] wearing a Boston Bruins sweatshirt that appears identical to the one recovered from the white Hyundai sedan, as well as the one worn during the traffic stop and arrest of ALLEN R. CLARK on January 9, 2022, described in

¹¹ Bank surveillance equipment was not working properly during this larceny. Because of the poor-quality footage, it is not possible to identify the individual posing as Victim 1.

paragraph 21, above.¹² I believe that the same footage also depicts ALLEN R. CLARK¹³ with [REDACTED] also making a purchase. I have also viewed Eastview Mall footage



which I believe depicts ALLEN R. CLARK, [REDACTED] and [REDACTED] walking together in the mall corridor at approximately 4:25 PM.¹⁴

46. On March 10, 2022, one month after the crimes detailed herein, the United States Probation Officer assigned to supervise [REDACTED] received an email. The email was unsigned but had 4 images attached. One of the images depicts [REDACTED] and ALLEN R. CLARK seated together in one of the courts inside of Eastview Mall. [REDACTED] is dressed in a jacket appearing identical to the jacket he wore during the traffic stop and arrest of CLARK and worn by the individual who fled the arrest of

14



FREIMAN. CLARK is depicted fanning out a large amount of cash for the cameras view.

There is no date or time information that could be associated with the image.¹⁵



15

47. A receipt from the 7-Eleven store located at 2499 East Henrietta Road, Rochester, New York, dated January 12, 2022, at 5:43 PM, was located during a search of the white Hyundai sedan. A review of the 7-Eleven store surveillance system revealed that an individual I believe to be [REDACTED] entered the store at a time contemporaneous with the time on the receipt. The individual was wearing what appears to be the same Boston Bruins Sweatshirt and was driving a white sedan.¹⁶

48. On January 13, 2022, the larcenies attributable to the conspirators began again.

49. At approximately 10:13 AM, a white Hyundai sedan arrived at the drive through lanes of the ESL Federal Credit Union branch located at 100 Canal View Blvd, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as

¹⁶



Victim 4, cashed a check in the amount of \$2895.00 and drawn on the account of Victim 6, made payable to Victim 4.

50. At approximately 10:27 AM, a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 1881 Monroe Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2760.00 and drawn on the account of Victim 6, made payable to Victim 4.

51. At approximately 10:58 AM a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 3169 Chili Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2920.00 and drawn on the account of Victim 6, made payable to Victim 4.

52. At approximately 11:22 AM a white Hyundai sedan with no front mounted license plate arrived at the drive through lanes of the ESL Federal Credit Union branch located at 250 Lake Avenue, Rochester, New York. An individual appearing to be LIZA J. FREIMAN, posing as Victim 4, cashed a check in the amount of \$2885.00 and drawn on the account of Victim 6, made payable to Victim 4.

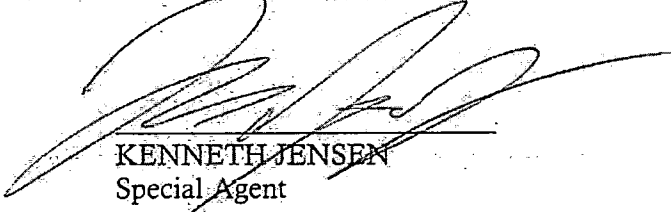
53. The next crime perpetrated by the conspirators was the event that led to the short chase and arrest of LIZA J. FREIMAN, which occurred in Southport, New York on January 13, 2022, and is detailed in paragraphs 9 – 12, above.

CONCLUSION

54. For the reasons stated above, I believe that [REDACTED], [REDACTED]

[REDACTED] ALLEN R. CLARK, and LIZA J. FREIMAN conspired together to steal the

identities and banking information of the victims identified herein, and then used that stolen information and material to perpetrate acts of bank fraud at various branches of ESL Federal Credit Union and Elmira Savings Bank, all located within the Western District of New York. In total, the group was able to obtain more than \$50,000 in proceeds from their scheme. I therefore respectfully submit that there is probable cause to conclude that that [REDACTED] [REDACTED] ALLEN R. CLARK, LIZA J. FREIMAN, and [REDACTED] [REDACTED] each conspired to commit, aided and abetted the commission of, and substantively committed and attempted to commit bank fraud and aggravated identity theft, all in violation of Title 18, United States Code, Sections 1344, 1349 & 1028A.


KENNETH JENSEN
Special Agent
Federal Bureau of Investigation

Affidavit submitted electronically by email in pdf format. Oath administered, and contents and signature, attested to me as true and accurate telephonically pursuant to Fed. R. Crim. P. 4.1 and 4(d) on this 23rd day of June 2022.


MARK W. PEDERSEN
United States Magistrate Judge

AO 442 (Rev. 11/11) Arrest Warrant

UNITED STATES DISTRICT COURT

for the

Western District of New York

United States of America

v.

ALLEN R. CLARK

Case No. 22-MJ-616

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay
 (name of person to be arrested) ALLEN R. CLARK,
 who is accused of an offense or violation based on the following document filed with the court:

☐ Indictment ☐ Superseding Indictment ☐ Information ☐ Superseding Information ☒ Complaint
☐ Probation Violation Petition ☐ Supervised Release Violation Petition ☐ Violation Notice ☐ Order of the Court

This offense is briefly described as follows:

the defendant conspired with co-defendants to commit, aided and abetted the commission of, and substantively committed and attempted to commit bank fraud and aggravated identity theft, all in violation of Title 18, United States Code, Sections 1344, 1349 & 1028A.

Date: 23 June 2022

 Issuing officer's signature
City and state: Rochester, NY

Hon. Mark W. Pedersen, U.S. Magistrate Judge
 Printed name and title

Return

This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____

Date: _____

Arresting officer's signature

Printed name and title